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October 11, 2005

Docket Clerk
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: R.04-01-006

Dear Docket Clerk:

Enclosed for filing with the Commission are the original and five copies of the MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR AUTHORITY TO TAKE ACTIONS TO MITIGATE BILL IMPACTS ON LOW-INCOME CUSTOMERS DURING THE 2005 WINTER PERIOD in the above-referenced proceeding.

We request that a copy of this document be file-stamped and returned for our records. A self-addressed, stamped envelope is enclosed for your convenience.

Your courtesy in this matter is appreciated.

Very truly yours,

Larry R. Cope

[LRC:as:LAW-#1253192](#)

Enclosures

cc: All Parties of Record in R.04-01-006
All Parties of Record in A.05-06-005 et al.
(U 338-E)

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's)	
Proposed Policies and Programs Governing Post-)	Rulemaking 04-01-006
2003 Low-Income Assistance Programs)	(Filed January 8, 2004)
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**MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR
AUTHORITY TO TAKE ACTIONS TO MITIGATE BILL IMPACTS ON LOW-
INCOME CUSTOMERS DURING THE 2005 WINTER PERIOD**

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Dated: **October 11, 2005**

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INCOME CUSTOMERS DURING THE 2005 WINTER PERIOD**

I.

INTRODUCTION

Pursuant to Administrative Law Judge Weissman's October 7, 2005 email ruling, Southern California Edison Company (SCE) files this motion for authority to take actions to mitigate bill impacts on its low- and fixed-income customers during the 2005 winter period. Specifically, from November 30, 2005 through December 31, 2005, SCE requests the authority to:

- suspend the recertification requirement of CARE;
- waive the reconnect deposit for CARE customers;
- enhance senior and disabled eligibility for SCE's California Alternate Rates for Energy (CARE) by the revising the income eligibility of program to match the income eligibility of SCE's Low Income Energy Efficiency (LIEE) program; and
- allow SCE as part of SCE's Winter Rapid Deployment Initiative to consider CARE customers automatically "income eligible" for two LIEE measures - refrigerator replacements and CFLs - and not require proof of income. CARE customers would complete and sign a self-declaration form attesting to household size and income.

Concurrent with this Motion, SCE files a supplement to A.05-06-009 requesting authority to take these and other actions beginning January 1, 2006 during the 2006 – 2007 program cycle.

II.

DISCUSSION

A. Background

In D.05-04-052, issued April 21, 2005, the Commission authorized SCE to implement its CARE and LIEE programs through the end of 2005. On June 1, 2005, SCE filed its Application (A.05-06-009) Requesting Approval of Low Income Assistance Programs and Budgets for Program Years 2006 and 2007 (the “Application”) on June 1, 2005. Subsequently, concerns have arisen over the tight natural gas supply and expected higher natural gas prices this winter. These higher prices will create hardships for some customers, particularly low-income customers.

On September 13, 2005, the Commission noticed an en banc hearing, and directed the utilities to file comments and proposals for mitigating bill impacts on low-income customers during the winter season. SCE filed its proposals on September 28, 2005. At the en banc hearing, held October 6, 2005 in Los Angeles, legislators, regulators, SCE and other investor-owned utilities, CBOs and interested stakeholders presented the expected impacts on customers this winter, and made specific proposals for mitigating those effects on low income customers.

Subsequently, on October 6, 2005, Administrative Law Judge Weissman issued an email ruling directing the utilities to make any proposals for mitigating the bill impacts on low-income customers by no later than October 11, 2005, to enable the Commission to quickly act on these matters by October 27, 2005.

SCE’s proposed actions for the remainder of 2005 are discussed below.

B. SCE's Proposals for 2005

1. Suspend the CARE Recertification Requirement

Currently under the CARE program, recertification of customer eligibility is required (except for submetered customers) every two years.¹ SCE proposes to suspend this requirement during the 2005 winter period (November 30, 2005 – December 31, 2005). A substantial percentage of customers who remain eligible for CARE simply fail to recertify when prompted. SCE has observed that many customers who are removed from the CARE program for failure to recertify subsequently contact SCE to re-apply for CARE once they receive their first bill without the CARE discount.

To avoid the removal of eligible customers during this critical winter period, SCE requests authority to suspend the recertification requirement effective November 30, 2005 through December 31, 2005.

2. Waive the Reconnect Deposit for CARE Customers

SCE requests the authority to waive the reconnect deposit for each CARE customer whose electric service is disconnected between November 30, 2005 through December 31, 2005.

3. Senior and Disabled Eligibility Enhancement

SCE requests authority to revise the income eligibility of CARE to match the income eligibility of SCE's LIEE program same eligibility guideline for CARE that currently exists for LIEE. Currently for LIEE, the eligibility is 200% of the federal poverty income guideline set for households with persons 60 and over or persons with a permanent disability. SCE requests that this proposed modification to the CARE income guidelines become effective November 30, 2005, and remain effective until the Commission orders otherwise.

¹ See D.94-12-049, issued on December 21, 1994 in I.88-07-009, at Conclusion of Law 13 and Ordering Paragraph 6.

The Commission should direct SCE to file an advice letter modifying its tariffs to incorporate the requested modification to the CARE income guidelines. SCE will include an updated application as part of the advice filing, if necessary, however SCE plans to use an updated CARE application immediately upon effective authorization of this request.

4. Winter Rapid Deployment Initiative

As part of SCE's increased targeting of low-income customers through CBOs, SCE requests authority as part of its Winter Rapid Deployment Initiative to consider CARE customers automatically "income eligible" for two LIEE measures - refrigerator replacements and CFLs – and not require proof of income. CARE customers would complete and sign a self-declaration form attesting to household size and income.

C. The Commission Should Promptly Approve SCE's Pending 2006 - 2007 LIEE and CARE Application

To further enhance SCE's ability to proactively address the needs of low income customers this winter, the Commission should quickly approve SCE's June 1 Application and September 28, 2005 proposals, and further provide the flexibility to spend 2006 and 2007 authorized funds beginning in 2005. SCE discusses specific requests for 2006 – 2007 in the Supplement to the Application, filed concurrent with this Motion.

III.

CONCLUSION

SCE respectfully requests that the Commission authorize, from November 30, 2005 through December 31, 2005:

- the suspension the recertification requirement of CARE;
- the waiver of the reconnect deposit for CARE customers;

- revision of the income eligibility of SCE's California Alternate Rates for Energy (CARE) program to match the income eligibility of SCE's Low Income Energy Efficiency (LIEE) program; and
- allow SCE as part of SCE's Winter Rapid Deployment Initiative to consider CARE customers automatically "income eligible" for two LIEE measures - refrigerator replacements and CFLs – and not require proof of income. CARE customers would complete and sign a self-declaration form attesting to household size and income.

SCE further requests that the Commission direct SCE to file an advice letter modifying its tariff to incorporate the revised CARE income guidelines.

Respectfully submitted,

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October 11, 2005

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR AUTHORITY TO TAKE ACTIONS TO MITIGATE BILL IMPACTS ON LOW-INCOME CUSTOMERS DURING THE 2005 WINTER PERIOD on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or other addressee(s).
- Placing copies in properly addressed sealed envelopes and depositing such copies in the United States mail with first-class postage prepaid to all parties.
- Directing Prographics to place the copies in properly addressed sealed envelopes and to deposit such envelopes in the United States mail with first-class postage prepaid to all parties.

Executed this **11th day of October, 2005**, at Rosemead, California.

Meraj Rizvi
Project Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

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